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*Attorneys for Defendant Global Equity Holdings, Inc.*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

CESAR Z. MARAVILLA,

Plaintiff,

v.

GLOBAL EQUITY HOLDINGS, INC. dba  
COLLECT SOURCE,

Defendant.

Case No. 2:19-cv-01256-GMN-DJA

**STIPULATION AND PROPOSED  
ORDER PERMITTING LIMITED  
DEPOSITIONS FOLLOWING THE  
CLOSE OF DISCOVERY**

Plaintiff Cesar Z. Maravilla ("Plaintiff"), by and through his counsel of record, David H. Krieger, Esq. of Krieger Law Group, LLC and Charles L. Geisendorf, Esq. of Charles L. Geisendorf, Ltd. and Defendant Global Equity Holdings, Inc. dba Collect Source ("Defendant"), by and through its counsel of record, Jarrod L. Rickard, Esq. of Semenza Kircher Rickard, hereby file this Stipulation and Proposed Order Permitting Limited Depositions Following the Close of Discovery.

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1           **A.       Discovery That Remains to be Completed.**

2           Defendant's corporate designee's deposition and Plaintiff's deposition were previously  
3 noticed during the discovery period. The parties previously agreed to vacate these deposition  
4 dates and continue the discovery deadline by 60 days to engage in what they hoped will be  
5 productive settlement discussions. The parties agreed that in the event the case did not settle, the  
6 Defendant's deposition must take place before Plaintiff's and the parties reserve their rights to  
7 raise any discovery deficiencies and move to compel as needed consistent with LR 26-7 should  
8 the need arise.

9           **B.       Reasons for the Stipulation.**

10          The parties have been unable to reach a settlement but are still talking. However, the  
11 parties do not believe an additional discovery extension is necessary at this time as the only  
12 discovery remaining is the two previously noticed depositions. As such, the parties submit this  
13 stipulation in order to confirm their agreement that these depositions may occur outside the  
14 current discovery deadline. The parties reserve their rights to raise any discovery deficiencies  
15 and move to compel as needed consistent with LR 26-7 should the need arise. Additionally, the  
16 parties reserve their rights to seek an extension of the formal discovery period should they  
17 believe it is warranted.

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1 Should the Court prefer to continue the discovery deadline, the parties have no objection.

2 The parties request formal approval of their stipulation.

3 DATED this 7th day of August, 2020.

DATED this 7th day of August, 2020.

4 KRIEGER LAW GROUP, LLC

CHARLES L. GEISENDORF, LTD.

5 /s/ David H. Krieger

/s/ Charles L. Geisendorf

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8 *Attorneys for Plaintiff Cesar Z. Maravilla*

*Attorneys for Plaintiff Cesar Z. Maravilla*

10 DATED this 7th day of August, 2020.

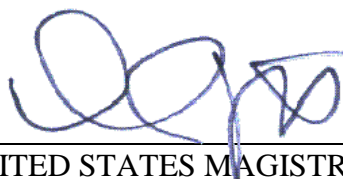
11 SEMENZA KIRCHER RICKARD

12 /s/ Jarrod L. Rickard

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17 *Attorneys for Defendant Global Equity*  
18 *Holdings, Inc. dba Collect Source*

20 **IT IS SO ORDERED.**



22 UNITED STATES MAGISTRATE JUDGE

23 DATED: August 10, 2020